

ORIGINAL

THOMAS SZOTT
Assistant United States Attorney
Wyoming Bar Number 7-5139
P.O. Box 668
Cheyenne, WY 82003
(307) 772-2124
Thomas.Szott@usdoj.gov

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2015 FEB 12 PM 2 31
STEPHAN HARRIS, CLERK
CHEYENNE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW LAMBERT SILICANI,

Defendant.

Criminal No. 15-MJ-13-1F

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

- ☒ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☐ 10+ year drug offense
- ☐ Serious risk Defendant will flee
- ☐ Felony, with two prior convictions in above categories
- ☐ Serious risk obstruction of justice

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States WILL NOT invoke the rebuttable presumption against the Defendant under § 3142(e). The presumption applies because:

_____ Probable cause to believe Defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

_____ Probable cause to believe Defendant committed the crime of child exploitation

_____ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

_____ At first appearance

☒ After a continuance of three days

DATED this 12th day of February, 2015.

CHRISTOPHER A. CROFTS
United States Attorney

By:



THOMAS SZOTT
Assistant United States Attorney